## Remarks

Claim 1 has been amended to delete the duplicated wording "wherein the step of assigning to said received contact said priority and said skillset identifier includes assigning multiple said skillset identifiers", which appeared in two locations in the claim due to an error.

Claims 7 and 15 have been amended to correct typographical errors in those claims, by deleting the word "either" in claim 7, and to change the phrase "plurality other of said software objects" to "plurality of other said software objects" in claim 15.

Claim rejections 35 USC § 103

Claims 1-16 stand rejected under 35 USC § 103(a) over Flockhart in view of Webber. Reconsideration is requested.

As regards the rejection of claims 1, 11 and 13:

It is clear that substantive differences exist between the claimed invention and the combination of Flockhart and Webber, introduced in the amendment filed with the last response and as acknowledged by the Examiner at page 4 of the Office Action (see italicized paragraph beginning "In considering new amendments to the claim...").

The Office Action suggests that such differences can be accounted for on the basis of common knowledge, pointing to Goodrich et al. as supporting evidence. Applicants respectfully submit that in order to make an obviousness rejection as argued by the Examiner, Goodrich is relied on, not as evidence of common knowledge, but rather as a third reference, i.e. that the explanation of the rejection makes it clear that the claims stand rejected over Flockhart in view of Webber and further in view of Goodrich. The level of modification required to Flockhart in view of Webber goes far beyond the "common knowledge" standard.

In any event, Applicants respectfully disagree that Goodrich provides evidence for the common knowledge which it is alleged to demonstrate, and Applicants further submit that it would not have been obvious to further modify the combination of Flockhart and Webber, whether on the basis of common knowledge or on the basis of the specific teachings of Goodrich, and thereby arrive at the claimed invention.

Goodrich et al discloses a number of methods of storing and manipulating List ADTs (abstract data types). The Office Action alleges that this document teaches "a list of arbitrary elements and pointers to other objects". Applicants agree with that limited statement.

The Office Action then states "One of ordinary skill in the art can see that a pointer can point to any object", before generalizing this to argue that this renders obvious pointers between objects in a "multidimensional linked list or tree". At this point, it is necessary to refer to what is in fact disclosed on page 2, upon which the Office Action relies in this regard:

**Slide 1:** **"List ADT"**

Teaches that a list is stored as a sequence of positions between arbitrary objects, where the object relationships are defined as a "before/after relation between positions." This slide relates to a single or simple list. No mention is made of multidimensional linked lists or trees.

**Slide 2:** **"Doubly Linked List"**

Teaches a model in which each node contains pointers (links) to both the before and after positions. This slide also relates to a single or simple list. No mention is made of multidimensional linked lists or trees.

**Slide 3:** **"Insertion"**

Teaches a method of manipulating objects by inserting object X between objects B and C by adding new links and thereby defining a new position in

the list. Again this slide relates to a single or simple list with no mention of multidimensional linked lists or trees.

**Slide 4:** **"Deletion"**

Teaches the removal of object D at the end of a list and redefining the links between C and the end of list to delete a position from the list. Again this slide relates to a single or simple list with no mention of multidimensional linked lists or trees.

**Slide 5:** **"Performance"**

Teaches the size of spaces needed to maintain and operate the list, i.e. with implications for the processing times required. Again this slide relates to a single or simple list with no mention of multidimensional linked lists or trees.

**Slide 6:** **"Sequence ADT"**

Teaches the methods used for the Sequence ADT, which is the union of the Vector ADT and the List ADT. Again this slide relates to a single or simple list with no mention of multidimensional linked lists or trees.

Accordingly, Goodrich teaches that an object can point to any other arbitrary object as part of the same simple list. There is nothing in any of the above slides which suggests or discloses "multidimensional linked lists". All the teaching relates to simple lists, either singly or doubly linked. Furthermore, nothing in the reference suggests implementing links between an element in a first list and an element in a second list.

Accordingly, Applicants refute the suggestion that this reference is evidence of common knowledge of a pointer pointing to any other object "to create a data structure such as a multidimensional linked list or tree", when clearly it makes no mention of such structures.

Furthermore, nothing in Goodrich teaches or suggests assigning multiple skillset identifiers to a contact, which is also not suggested in Flockhart or Webber. This claim feature cannot be obvious even if (as is disputed for the reasons given above) the abstract concept of what the Office Action refers to as "multidimensional linked lists" was part of the common knowledge.

Furthermore, nothing in the prior art teaches the desirability of linking between skillset queues, even if the abstract concept of what the Office Action refers to as "multidimensional linked lists" was part of the common knowledge (again this is disputed for the reasons given above).

As regards the rejection of claims 2, 3 and 5-7:

These claims are dependent on claim 1 and are submitted to be patentable for at least the same reasons as given above. (It is noted for completeness that claim 4 was cancelled).

As regards the rejection of claims 8, 10, 12 and 14:

The rejection contains no mention of the feature of "at least some of the software objects containing separate pointers to software objects in different queues", which is common to each of these claims and which was introduced in the last response. The rejection appears to be based on the claims as they existed prior to the amendment introduced in the last response. Accordingly, the rejection of these claims appears incomplete at least.

For completeness it is pointed out that none of the three prior art references relied on contains any teaching or suggestion of software objects containing separate pointers to software objects in different queues. Goodrich teaches only pointers internally within a single list.

As regards the rejection of claims 9 and 15:

These claims are dependent on claims 8 and 14, respectively, and thus insofar as the rejection fails to address the feature omitted from the rejection of those independent claims, the rejection is similarly incomplete regarding claims 9 and 15. For completeness it is nevertheless argued that these claims are submitted to be patentable for at least the same reasons as given above.

As regards the rejection of claim 16:

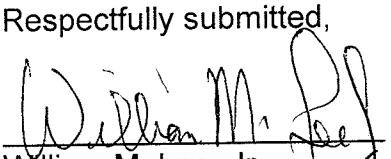
For the reasons given above in relation to claim 1, it is disputed that Goodrich provides evidence of any common knowledge of multidimensional linked lists, and even if it did contain such an abstract teaching (which is disputed), the prior art fails to provide any teaching of pointers between queues representing different skillsets.

In view of the amendments and arguments made herein, the applicants respectfully request the examiner withdraw the rejections, and allow the application.

As this response is being submitted during the sixth month following the Examiner's Office Action, an appropriate Petition for Extension of Time is also submitted herewith.

September 3, 2010

Respectfully submitted,



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